

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

INTELLECTUAL VENTURES I LLC and)
INTELLECTUAL VENTURES II LLC,) Civil Action No. 2:13-cv-00740-AJS
)
Plaintiffs,) U.S. District Judge Arthur J. Schwab
)
v.) **ELECTRONICALLY FILED**
)
PNC FINANCIAL SERVICES GROUP, INC.)
and PNC BANK, N.A.,)
)
Defendants.)

**DECLARATION OF GREGORY H. LANTIER IN SUPPORT OF DEFENDANTS PNC
FINANCIAL SERVICES GROUP, INC.'S AND PNC BANK, N.A.'S
RESPONSE TO PLAINTIFFS' MOTION FOR LEAVE TO
FILE AN AMENDED COMPLAINT**

I, Gregory H. Lantier, hereby declare as follows:

1. I am an attorney admitted *pro hac vice* to this Court and admitted to practice in the State of New York (Bar No. 4823217), the District of Columbia (Bar No. 492043), and the Commonwealth of Virginia (Bar No. 65657). I am a partner at the law firm Wilmer Cutler Pickering Hale and Dorr LLP and counsel for Defendants PNC Financial Services Group, Inc. and PNC Bank, N.A. in the above-captioned matter. I provide this declaration in support of Defendants' Response to Plaintiffs' Motion for Leave to File an Amended Complaint. I have personal knowledge of the information set forth herein, and I could and would competently testify thereto if called as a witness.

2. Attached hereto as Exhibit A is a true and accurate copy of Exhibit E of Intellectual Ventures I LLC's and Intellectual Ventures II LLC's (collectively, "IV") Infringement Contentions served on August 16, 2013 in the above-captioned matter, which asserts IV's infringement theories with respect to U.S. Patent No. 7,757,298.

3. Attached hereto as Exhibit B is a true and accurate copy of a redline document prepared by my law firm that compares IV's original complaint filed on May 29, 2013, with the amended complaint attached as Exhibit A to IV's Motion for Leave to File an Amended Complaint, filed on October 7, 2013.

4. Attached hereto as Exhibit C is a true and accurate copy of the Scheduling Order entered by Judge Lancaster in *New Eng. Interconnect Sys., Inc. v. AEES, Inc.*, No. 10-0758, 2011 WL 2118853 (W.D. Pay. May 27, 2011), which was obtained from the Public Access to Court Records database.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: October 16, 2013

/s/ Gregory H. Lantier
Gregory H. Lantier (*pro hac vice*)
District of Columbia Bar ID No. 492043